

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

IN THE MATTER OF:

REAGOR-DYKES MOTORS, LP  
REAGOR-DYKES IMPORTS, LP  
REAGOR-DYKES AMARILLO, LP  
REAGOR-DYKES AUTO COMPANY, LP  
REAGOR-DYKES PLAINVIEW, LP  
REAGOR-DYKES FLOYDADA, LP

CASE NO. 18-50214  
CASE NO. 18-50215  
CASE NO. 18-50216  
CASE NO. 18-50217  
CASE NO. 18-50218  
CASE NO. 18-50219

DEBTOR

CHAPTER 11

MOTION OF MIDLAND COUNTY TO INTERVENE IN THE  
MOTION FOR RELIEF FROM STAY BY MANHEIM

TO THE HONORABLE BANKRUPTCY JUDGE:

**AN ORDER WILL BE ENTERED GRANTING THE RELIEF REQUESTED HEREN WITHOUT FURTHER HEARING UNLESS A WRITTEN OBJECTION AND REQUEST FOR HEARING IS FILED WITH THE CLERK WITHIN TWENTY-ONE (21) DAYS OF THE DATE OF ISSUANCE OF THIS NOTICE. ANY SUCH OBJECTION MUST ALSO BE SERVED UPON THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.**

NOW COMES Midland County, files its Motion to Intervene in the Motion for Relief

From Automatic Stay by Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC

(“Motion”) and would show the court the following:

1. Midland County are political subdivisions of the State of Texas.
2. There are property taxes for 2017 and estimated 2018 due in an approximate amount of \$5,482.14 on the Debtor’s property described as Vehicle Inventory used in the operation of Reagor-Dykes, Inc. and associated cases. The property taxes for 2017 are due in the estimated balance of \$3,224.26. The estimated taxes for 2018 are due in the estimated balance of \$2,257.88. The 2018 estimated taxes are based upon the base taxes assessed for 2017 and final assessment of

these taxes will occur later in 2018. These property taxes are a liquidated secured claim against the Debtor's property and are entitled to priority over other secured claims under 11 U.S.C. § 506.

3. The laws of the State of Texas, Property Tax Code, Section 32.05(b), give the tax lien represented by the delinquent property taxes priority over the lien of any other claim or lien against this property.

4. Midland County has a statutory security interest in the property which is the subject of Manheim.

5. WHEREFORE, Midland County prays that the Court order the automatic stay be modified at the same time and to the same extent, and under the same terms for Midland County, as for the original movant Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC and for other and such relief as is just and proper. Midland County further prays that the Court order Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC to immediately notify Midland County through undersigned in the event Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC takes possession of its collateral that is the subject of its Motion, and for other and such relief is just and proper.

Dated: August 16, 2018

Respectfully Submitted,  
**PERDUE, BRANDON, FIELDER,  
COLLINS & MOTT, L.L.P.**

/s/ Laura J. Monroe  
LAURA J. MONROE  
SBN: 14272300  
P.O. Box 817  
Lubbock, Texas 79408  
Phone: 806-744-5091  
Fax: 806-744-9953  
Attorney for Midland County

CERTIFICATE OF SERVICE

I hereby certify that the above Motion to Intervene has been served upon the following parties as well as all parties receiving the Court's ECF service on August 16<sup>th</sup>, 2018.

/s/ Laura J. Monroe  
LAURA J. MONROE

Reagor-Dykes Auto Group  
1215 Avenue J  
Lubbock, TX 79401

Donald Cram & Duane M. Geck  
Severson & Werson  
Once Embarcadero Center, Suite 2600  
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Westlake, TX 76262

US Trustee's Office  
1100 Commerce Street, Room 9C60  
Dallas, TX 75242

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ORDER GRANTING MOTION OF MIDLAND COUNT TO INTERVENE  
IN THE MOTION FOR RELIEF FROM STAY BY MANHEIM

Upon consideration of the Motion of Midland County for leave to intervene in Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC's Motion for Relief From the Automatic Stay filed in this case, the court finds such Motion should be granted.

THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Midland County (Intervenor) is allowed to intervene in the Motion for Relief from Automatic Stay filed by Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC in this case. The stay is lifted as to the Intervenor to the same extent, with regard to the same property under the same terms as the stay is lifted as to Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC.

IT IS FURTHER ORDERED that if the stay is terminated and Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC takes possession of the collateral that is the subject of its Motion, Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC shall immediately notify, in writing, Midland County, by and through their attorney of record, that it has taken possession of any property subject to this motion to lift stay.

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